

## Community Reinvestment Act

**Questions 1 - 32 pertain only to "large institutions" unless they opt in early under the revised CRA regulation. Questions 33 - 34 apply to "small institutions", questions 35 -36 apply to "large retail institutions", questions 37 - 38 apply to "wholesale and limited-purpose institutions", and questions 39 and 40 apply to institutions with "strategic plans".**

	YES	NO
1. Has the board of directors:		
a. Adopted a CRA statement for each local community?	_____	_____
b. Approved any material change in each Statement at the first regular meeting after such change occurred?	_____	_____
c. Reviewed each Statement at least annually?	_____	_____
2. Does the institution maintain a "public file" as required?	_____	_____
3. Do the CRA public files contain:		
a. Signed public comments received in the past two years on the institution's CRA Statement or its community lending performance?	_____	_____
b. Any responses to the comments that the institution elected to make?	_____	_____
c. CRA Statement(s) in effect during the past two years?	_____	_____
d. The current evaluation prepared by the supervisory agency?	_____	_____
4. Are public files readily available for public inspection?	_____	_____
5. Are all file materials maintained at the head office, and are file materials relating to each local community maintained at a designated office in that community?	_____	_____
6. Does the CRA notice contain the required information and a disclosure of the availability of the evaluations to the public?	_____	_____
7. Is a notice provided in the public lobby of institution offices either as a part of the CRA Statement or separately?	_____	_____
8. Does each CRA Statement contain:		
a. A delineation of the institution's entire community, including local communities, if any?	_____	_____
b. A list of specific types of credit that the institution is prepared to extend within the local community?	_____	_____
c. The required notice including a disclosure of the availability to the public of the evaluation and ratings, either as part of the Statement or as an attachment?	_____	_____

9. Is the CRA Statement(s) readily available at the head office and at each office of the institution in the local community?

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Community Reinvestment Act (continued)		YES	NO
10.	If a charge is made for copies of the CRA Statement or the CRA performance evaluation, do records indicate this charge does not exceed the cost of reproduction and any applicable mailing fees?	_____	_____
11.	Does the CRA Statement contain the following additional information:		
a.	A description of how the institution's current efforts, including special credit-related programs, help to meet local credit needs?	_____	_____
b.	A periodic report on the institution's record of helping to meet community credit needs?	_____	_____
c.	A description of the institution's efforts to ascertain local credit needs, including efforts to communicate with members regarding credit services?	_____	_____
<i>NOTE: Inclusion of these items in the CRA Statement is not required, but is encouraged by regulation.</i>			
12.	Was the method used by the institution to define its community reasonable?	_____	_____
13.	Does the institution's delineation of community include all low- and moderate-income neighborhoods?	_____	_____
14.	Do the types of credit made by the institution correspond to the types of credit listed in the CRA Statement?	_____	_____
15.	Do the types of credit the institution has made and is currently making appear reasonable?	_____	_____
16.	Do any material changes in the types of credit the institution has made and is currently making appear reasonable?	_____	_____
17.	Do the institution's procedures ensure that applications for listed credits are accepted?	_____	_____
18.	Are credit and credit-related services at any offices in low- and moderate-income neighborhoods comparable to such services at other similar offices?	_____	_____
19.	Does the institution originate or purchase residential mortgage loans, housing rehabilitation loans, and home improvement loans in the local community?	_____	_____
20.	Does the institution originate or purchase small business loans or loans to small farms in the local community?	_____	_____
21.	Does the institution's financial condition allow it to fully help meet community credit needs?	_____	_____
22.	Is the institution aware of unmet credit needs in the community?	_____	_____
23.	Does the institution consult with members of its local community about its plans and policies on available credit services?	_____	_____

<b>Community Reinvestment Act (continued)</b>		<b>YES</b>	<b>NO</b>
24.	Is the Board of Directors supportive of and involved in the CRA process?	_____	_____
25.	Is the Board of Directors involved in approval, review and monitoring of marketing and advertising programs?	_____	_____
26.	Are the institution's marketing strategies and advertising responsive to identified community credit needs?	_____	_____
27.	Does the institution regularly perform and document analyses of the geographic distribution of its lending?	_____	_____
28.	Are the results of geographic distribution analyses considered in establishing and evaluating the CRA program and lending policies?	_____	_____
29.	Has the institution taken action to minimize the impact of branch closings?	_____	_____
30.	Does the institution have policies in place regarding the closing of branches, and does it follow them?	_____	_____
31.	Does the institution give adequate and timely advance notification to customers of any planned branch closures?	_____	_____
32.	Does the institution participate in investment in local community development and redevelopment projects or programs?	_____	_____

**Community Reinvestment Act (continued)****YES****NO****Public File – Small Institutions**

*NOTE: There is no need to review each branch or each complete public file during every examination. In determining the extent to which the institution's public files should be reviewed, consider the institution's record of compliance with the public file requirements in previous examinations, its branching structure and changes to it since its last examination, complaints about the institution's compliance with the public file requirements, and any other relevant information.*

33. In any review of the public file undertaken, determine, as needed, whether branches display an accurate public notice in their lobbies, a complete public file is available in the institution's main office and at least one branch in each state, and that the public file is available in the main office and in a branch in each state contains:
- All written comments from the public relating to the institution's CRA performance and responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution) \_\_\_\_\_
  - The institution's most recent CRA Public Performance Evaluation \_\_\_\_\_
  - A map of each assessment area showing its boundaries and, on the map or in a separate list, the geographies contained within the assessment area(s) \_\_\_\_\_
  - A list of the institution's branches, branches opened and closed during the current and each of the prior two calendar years, and their street addresses and geographies \_\_\_\_\_
  - The HMDA Disclosure Statement for the prior two calendar years, if applicable \_\_\_\_\_
  - The institution's loan-to-deposit ratio for each quarter of the prior calendar year \_\_\_\_\_
  - A quarterly report of the institution's efforts to improve its record if it received a less than satisfactory rating during its most recent CRA examination \_\_\_\_\_
  - A list of services (loan and deposit products and transaction fees generally offered, and hours of operation at the institution's branches), including a description of any material differences in the availability or cost of services among locations \_\_\_\_\_

**Community Reinvestment Act (continued)**

**YES      NO**

34.      In any branch review undertaken, determine whether the branch provides the most recent public evaluation and a list of services available at the branch or a description of material differences from the services generally available at the institution's other branches.

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**Community Reinvestment Act (continued)****YES****NO****Public File – Large Retail Institutions**

*NOTE: This checklist is to be used when examining large retail institutions that:*

- 1) Opt in early under the revised regulation, and*
- 2) All large institutions beginning July 1, 1997.*

There is no need to review each branch or each complete public file during every examination. In determining the extent to which the institution's public files will be reviewed, consider the institution's record of compliance with the public file requirements in previous examinations; its branching structure and changes to it since its last examination; complaints about the institution's compliance with the public file requirements, and any other relevant information.

35. In any review of the public file undertaken, determine, as needed, whether branches display an accurate public notice in their lobbies and the file(s) in the main office and in each state contains:

- All written comments from the public relating to the institution's CRA performance and responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution) \_\_\_\_\_
- The institution's most recent CRA Public Performance Evaluation \_\_\_\_\_
- A map of each assessment area showing its boundaries, and on the map or in a separate list, the geographies contained within the assessment area(s) \_\_\_\_\_
- A list of the institution's branches, branches opened and closed during the current and each of the prior two calendar years, and their street addresses and geographies \_\_\_\_\_
- A list of services (loan and deposit products and transaction fees generally offered, and hours of operation at the institution's branches), including a description of any material differences in the availability or cost of services between these locations \_\_\_\_\_
- The institution's CRA disclosure statements for the prior two calendar years \_\_\_\_\_
- A quarterly report of the institution's efforts to improve its record if it received a less than satisfactory rating during its most recent CRA examination \_\_\_\_\_
- The HMDA Disclosure Statement for the prior two calendar years for the institution and for each non-depository affiliate the institution has elected to include in assessment of its CRA record, if applicable \_\_\_\_\_

Community Reinvestment Act (continued)		YES	NO
•	If applicable, the number and amount of consumer loans made to the four income categories of borrowers and geographies (low, moderate, middle and upper), and the number and amount located inside and outside of the assessment area(s)	_____	_____
36.	In any branch review undertaken, determine whether the branch provides the most recent public evaluation and a list of services generally available at its branches and a description of any material differences in availability or cost of services at the branch (or a list of services available at the branch).	_____	_____



Public File – Wholesale and Limited-Purpose Institutions

NOTE: There is no need to review each branch or each complete public file in every examination. In determining the extent to which the public files should be reviewed, consider the institution’s record of compliance with the public file requirements in previous examinations, its branching structure and changes to it since its last examination, complaints about the institution’s compliance with the public file requirements, and any other relevant information.

37.	In any review of the public file undertaken, determine, as needed, whether branches display an accurate public notice in their lobbies, a complete public file is available in the institution’s main office and at least one branch in each state, and the public file(s) in the main office and in each state contain:		
	• All written comments from the public relating to the institution's CRA performance and any responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution)	_____	_____
	• The institution's most recent CRA Performance Evaluation	_____	_____
	• A map of each assessment area showing its boundaries and, on the map or in a separate list, the geographies contained within the assessment area(s)	_____	_____
	• A list of the institution's branches, branches opened and closed during the current and each of the prior two calendar years, their street addresses and geographies	_____	_____
	• A list of services (loan and deposit products and transaction fees) generally offered, and hours of operation at the institution's branches, including a description of any material differences in the availability or cost of services between those locations	_____	_____
	• The institution's CRA Disclosure Statement(s) for the prior two calendar years	_____	_____
	• A quarterly updated progress report describing the institution's efforts to improve its performance if it received a less than satisfactory rating during its most recent CRA examination	_____	_____
	• HMDA Disclosure Statements for the prior two calendar years and those of each non-depository affiliate the institution has elected to include in assessment of its CRA record, if applicable	_____	_____
	• If applicable, the number and amount of consumer loans made to the four income categories of borrowers and geographies (low, moderate, middle, and upper), located inside and outside of the assessment area(s)	_____	_____

**Community Reinvestment Act (continued)**

**YES      NO**

38.      In any branch review undertaken, determine whether the branch provides the most recent public evaluation and a list of services generally available at its branches and a description of any material differences in the availability or cost of services at the branch (or a list of services available at the branch).

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**Community Reinvestment Act (continued)****YES****NO****Public File – Institutions with Strategic Plans**

*NOTE: There is no need to review each branch or each complete public file during every examination. In determining the extent to which the institution's public files should be reviewed, consider the institution's record of compliance with the public file requirements in previous examinations, its branching structure and changes to it since its last examination, complaints about the institution's compliance with the public file requirements, and any other relevant information.*

39. In any review of the public file undertaken, determine, as needed, whether branches display an accurate public notice in their lobbies; a complete public file is available in the institution's main office and at least one branch in each state, and the public file available in the main office and in a branch in each state contains:
- A copy of the approved strategic plan \_\_\_\_\_
  - All written comments from the public relating to the institution's CRA performance and any responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution) \_\_\_\_\_
  - The institution's most recent CRA Performance Evaluation \_\_\_\_\_
  - A map of each assessment area showing its boundaries and, on the map or in a separate list, the geographies contained within the assessment area(s) \_\_\_\_\_
  - A list of the institution's branches, branches opened and closed during the current and each of the prior two calendar years, their street addresses and geographies \_\_\_\_\_
  - A list of services (loan and deposit products and transaction fees) generally offered, and hours of operation at the institution's branches, including a description of any material differences in the availability or cost of services between those locations \_\_\_\_\_
  - The institution's CRA Disclosure Statement(s) for the prior two calendar years \_\_\_\_\_
  - A quarterly updated progress report of the institution's efforts to improve its record if it received a less than satisfactory rating during its most recent CRA examination \_\_\_\_\_
  - HMDA Disclosure Statements for the prior two calendar years and those of each non-depository affiliate the institution has elected to include in assessment of its CRA record, if applicable \_\_\_\_\_

Community Reinvestment Act (continued)		YES	NO
<ul style="list-style-type: none"> <li>• The number and amount of consumer loans, for large banks, if applicable</li> <li>• The loan-to-deposit ratio, for small institutions</li> </ul>		_____	_____
		_____	_____
40.	In any branch review undertaken, determine whether the branch provides the most recent public evaluation and a list of services available at the branch or a description of material differences from the services generally available at the institution's other branches.	_____	_____